

REMARKS

Claims 1-15 are pending in this application. Reconsideration and allowance of the present application are respectfully requested.

In the Office Action dated March 31, 2005, claim 13 was rejected under 35 U.S.C. §102(b) as being anticipated by Tanaka (EP-1137054). Applicants respectfully traverse this rejection.

Independent claim 13 of the present application recites a lithographic projection apparatus that includes, *inter alia*, a projection system positioning module that controls at least one of a position and an orientation of the projection system during projection of the patterned beam of radiation onto a target portion of the substrate. Tanaka does not disclose or suggest all of the features of claim 13.

Tanaka teaches the use of a parallel link mechanism (74) that is employed to initially set the position and attitude of the projection optical system (PL) when starting up the exposure apparatus (10) after the completion of its assembly in the factory. (Tanaka at [0148], FIGs. 1, 2.) Tanaka makes it clear that once the position and attitude of the projection system (PL) is set initially, the rods (118₁, 118₂, 118₃) are kept in the after-adjustment state. (Tanaka at [0148].) Although Tanaka discloses that the initial setting may be repeated at a predetermined time interval or performed as the need arises, such as when fine deformation of the clean room floor occurs (Tanaka at [0149]), Tanaka does not disclose or even remotely suggest that such positioning takes place during projection of the patterned beam of radiation onto a target portion of the substrate, as recited by claim 13.

Accordingly, Applicants respectfully submit that claim 13 is patentable over Tanaka, because Tanaka does not disclose or suggest all of the features of claim 13, and respectfully request that the rejection to claim 13 be withdrawn.

Applicants acknowledge with appreciation that claims 1-12, 14, and 15 have been allowed. However, in view of the above discussion, Applicants respectfully submit that all of the pending claims are allowable.

All rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited. If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the undersigned at the telephone number listed below.

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Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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